

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

|                                 |   |                        |
|---------------------------------|---|------------------------|
| <b>UNITED STATES OF AMERICA</b> | : |                        |
|                                 | : |                        |
| -vs-                            | : | <b>No. 3:23-CR-127</b> |
|                                 | : |                        |
| <b>THOMAS TROTTA,</b>           | : | <b>(Judge Mannion)</b> |
|                                 | : |                        |
| <b>Defendant</b>                | : |                        |

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**REPORT OF MEDICAL ASSESSMENT OF THE DEFENDANT**

AND NOW comes the Defendant, Thomas Trotta, by and through his attorney Joseph R. D'Andrea, Esq., hereby provides this Honorable Court with medical documentation regarding the assessment and prognosis of the Defendant's medical issues and avers as follows:

1. On May 22, 2023, the United States Attorney for the Middle District of Pennsylvania filed a felony Information, charging Defendant Thomas TROTTA with one violation of 18 U.S.C. §§668 and 2, Theft of Major Artwork, Aid and Abet;
2. The Defendant plead guilty before the Honorable Malachy Mannion on July 5, 2023;

3. The Defendant was required to self-surrender on May 31, 2024; however, due to certain serious medical issues, the self-surrender has been extended;

4. By Order of the Court, dated May 31, 2024, the Court so ordered that the Defendant provide the Court with documentation of his medical condition and prognosis;

5. Attached please find letters from Mr. Trotta's medical team as well as case notes detailing the extent of the Defendant's injuries, as well as the suggested medical treatment;

6. Also, please find a photograph of the large, open leg wound, which was taken after the Defendant's third surgery, on May 31, 2024;

7. The Defendant presently is suffering from a major laceration, which has become infected;

8. The Defendant's doctors believe that incarceration of the Defendant would be against his best medical interest;

9. It is respectfully requested that the Court allow the Defendant proper medical treatment, as his doctors have suggested and allow him not to surrender until his medical condition greatly improves;

10. The Defendant suggests that, if the Court deem that some type of incarceration is necessary, the Defendant will respectfully request that he be allowed to submit to home confinement, until he is in better health to surrender into a prison situation;

11. The Court required the submission of these findings by 12 pm June 3, 2024 however the Defendant was at the mercy of the doctors to provide the necessary information and requests the Court allowing him the submittal of this report untimely.

WHEREFORE, it is respectfully requested that the Court allow the Defendant proper medical treatment, as his doctors have suggested and allow him not to surrender until his medical condition greatly improves;

Respectfully submitted,

Date: June 3, 2024

/s/ Joseph R. D'Andrea  
JOSEPH R. D'ANDREA, Esq  
Attorney for Thomas Trotta

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| <b>vs.</b>                      | : |                        |
|                                 | : | <b>(Judge Mannion)</b> |
|                                 | : |                        |
| <b>THOMAS TROTTA,</b>           | : |                        |
| <b>Defendant.</b>               | : |                        |

**CERTIFICATE OF SERVICE**

I, Joseph R. D'Andrea, do hereby certify that this document, the foregoing Motion, have been electronically serviced via e-mail, including the following:

James M. Buchanan, Esq.  
Assistant United States Attorney  
U.S. Attorney's Office, Middle District of Pennsylvania  
235 N. Washington Avenue, Suite 311  
Scranton, PA 18503  
James.Buchannan@usdoj.gov

And by placing the same in the United States mail, first class, postage prepaid, at Scranton, Pennsylvania, addressed to the following:

Thomas Trotta

Joseph R. D'Andrea  
JOSEPH R. D'ANDREA, ESQ.  
Attorney for Thomas Trotta

Date: June 3, 2024

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|                                 | : | <b>(Judge Mannion)</b> |
|                                 | : |                        |
| <b>THOMAS TROTTA,</b>           | : |                        |
| <b>Defendant.</b>               | : |                        |

**CERTIFICATE OF NONCONCURRENCE**

I, Joseph R. D'Andrea, Counsel for the Defendant, contacted the Assistant United States Attorney, James Buchanan, to discuss the foregoing Motion wherein he indicated that the Government does not concur in the same at this time.

Date: June 3, 2024

Joseph R. D'Andrea  
JOSEPH R. D'ANDREA, ESQ.  
Attorney for Thomas Trotta

LVPg INTERNAL MEDICINE-STEAMTOWN  
300 LACKAWANNA AVE  
STE 200  
SCRANTON PA 18503-2001  
Phone 570-342-7864  
Fax 570-614-2039

June 3, 2024

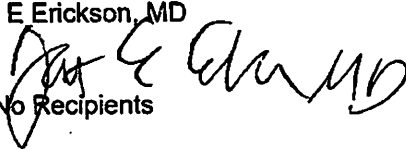
Thomas Trotta  
200 Chestnut St Apt 1  
Dunmore PA 18512

Thomas Trotta is under my medical care. Patient currently has an open wound on his left thigh. He will need frequent monitoring of the wound to ensure proper healing. Patient will be seeing wound care regularly. Incarceration would be detrimental to Thomas's health if he were to not have the ability to have this wound monitored and treated properly.

Sincerely,

Janet E Erickson, MD

CC: No Recipients

A handwritten signature in black ink, appearing to read "Janet E Erickson MD", is written over the "CC: No Recipients" text.

6/3/24, 11:31 AM

Trotta, Thomas (MRN 10508608) DOB: 06/06/1975 Encounter Date: 06/03/2024

**Letter by Joshua D Wilbur, PA-C on 6/3/2024**

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LVPD ORTHOPEDIC INJURY CENTER - DICKSON CITY  
334 MAIN STREET  
DICKSON CITY PA 18519-1668  
Phone 570-307-1767  
Fax 570-307-1783

To whom it may concern,

Thomas Trotta is under our care and requires frequent wound care supervision. It is medically necessary that he is to be seen/follow up for the care of his wound until healed. Therefore, being in prison would be detrimental to his health. Will reassess on his next appointment on June 12, 2024.

Sincerely,

Joshua D Wilbur, PA-C

**Communication Routing Information**

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| Recipient     | Relationship | Method        | Details |
|---------------|--------------|---------------|---------|
| Thomas Trotta | Patient      | Print Locally |         |

6/3/24, 2:32 PM

Trotta, Thomas (MRN 10508608) DOB: 06/06/1975 Encounter Date: 05/29/2024

**Trotta, Thomas**

MRN: 10508608

**Office Visit** 5/29/2024  
 LVPG Orthopedics and Sports  
 Medicine - Montrose

Provider: Joshua D Wilbur, PA-C (Orthopedics)  
 Primary diagnosis: Abscess of left thigh  
 Reason for Visit: Follow-up

**Progress Notes**

Joshua D Wilbur, PA-C (Physician Assistant) • Orthopedics

Cosigned by: Brian M Cable, MD at 5/29/2024 10:41 AM

Attestation signed by Brian M Cable, MD at 5/29/2024 10:41 AM

I have reviewed the documentation and agree with the plan of care as documented by the PA-C.

**Subjective:**

Patient is a 48-year-old male that presents into the clinic for a postoperative follow-up. Patient had a incision and drainage of left anterior distal thigh abscess compartment with cable on May 11, 2024. Patient has had a wound VAC in place with subsequent care received by wound care nurses 3 times weekly. Patient has had persistent drainage into his canister despite this treatment. In addition, he has been on antibiotics. Denies any constitutional symptoms at this time.

The following portions of the patient's history were reviewed and updated as appropriate: allergies, current medications, past family history, past medical history, past social history, past surgical history, and problem list.

**Objective:****Objective** ✓

Ht 1.753 m (5' 9") | Wt 96.2 kg (212 lb) | BMI 31.31 kg/m<sup>2</sup>

**Physical Exam**

General: Alert and oriented resting comfortably on a exam room chair in no apparent distress.  
 Musculoskeletal: There is some increased erythema around the wound VAC sponge. In addition, drainage noted in the canister.

**Review of Systems**

As per chart review

**Imaging:****CT FEMUR LEFT W CONTRAST**

Narrative: History: Soft tissue infection suspected

CT left femur with contrast, 100 cc Omnipaque 350.

**FINDINGS:**

Compared to CT from 4/23/2024, persistent elongated fluid collection with some peripheral enhancement, possibly representing abscess, in the mid to distal portion of the rectus femoris musculature and overlying subcutaneous tissues,



6/3/24, 2:32 PM

Trotta, Thomas (MRN 10508608) DOB: 06/06/1975 Encounter Date: 05/29/2024

measuring about 1.9 x 1.7 cm in cross-section at about 5.7 cm craniocaudal. No soft tissue gas. No bony destruction to indicate osteomyelitis.  
 Impression: IMPRESSION: Persistent fluid collection suspicious for abscess in the appropriate clinical setting.

CT examination performed with dose lowering protocol in accordance with ALARA.

Workstation:WR010031

#### CT FEMUR LEFT W CONTRAST

Result Date: 5/9/2024

History: Soft tissue infection suspected CT left femur with contrast, 100 cc Omnipaque 350. FINDINGS: Compared to CT from 4/23/2024, persistent elongated fluid collection with some peripheral enhancement, possibly representing abscess, in the mid to distal portion of the rectus femoris musculature and overlying subcutaneous tissues, measuring about 1.9 x 1.7 cm in cross-section at about 5.7 cm craniocaudal. No soft tissue gas. No bony destruction to indicate osteomyelitis.

IMPRESSION: Persistent fluid collection suspicious for abscess in the appropriate clinical setting. CT examination performed with dose lowering protocol in accordance with ALARA. Workstation:WR010031

#### CT FEMUR LEFT W CONTRAST

Result Date: 5/9/2024

IMPRESSION: Persistent fluid collection suspicious for abscess in the appropriate clinical setting. CT examination performed with dose lowering protocol in accordance with ALARA. Workstation:WR010031

No results found for this or any previous visit.

#### Assessment/Plan:

##### Assessment ^

##### Abscess of left thigh

- SURGICAL COMMUNICATION

Due to the persistent drainage despite antibiotics and wound VAC therapy it was recommended the patient return to the operating room for incision and drainage of the left distal anterior thigh abscess. Dr. Cable came in to discuss the treatment options as well. Patient will be scheduled for this Friday, May 31, 2024. Subsequently, patient will be admitted for further wound care treatment and IV antibiotics.

#### Discussion

Reviewed previous records from Epic and outside sources  
 Discussed results of imaging studies and labs with patient.

Joshua D Wilbur, PA-C

**Disclaimer:** This note was completed utilizing Dragon (Speech Voice Recognition Software). Grammatical errors, random word insertions, and incomplete sentences are occasional consequences of the system. Questions or concerns about the content should be directed to the provider for clarification.

